

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TQ DELTA, LLC,)	
)	
Plaintiff,)	C.A. No. - 1:13-cv-02013-RGA
)	
v.)	
)	JURY TRIAL DEMANDED
ZYXEL COMMUNICATIONS, INC.)	
and)	
ZYXEL COMMUNICATIONS)	
CORPORATION,)	
)	
Defendants.)	

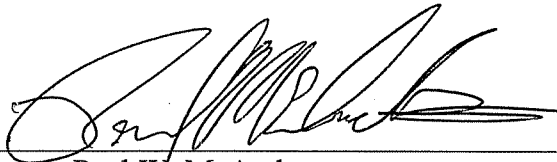
DECLARATION OF PAUL W. MCANDREWS

I, Paul W. McAndrews, an attorney representing Plaintiff TQ Delta, Inc. in the above-captioned matter, declare under the penalty of perjury of the laws of the United States, as follows:

1. Attached hereto is Exhibit A, a true and accurate copy of the Patent Statement and Licensing Declaration for ITU-T or ITU-R Recommendation/ISO or IEC Deliverable.
2. Attached hereto is Exhibit B, a true and accurate copy of the ITU Patent Policy.
3. Attached hereto is Exhibit C, a true and accurate copy of the ITU's Guidelines for Implementing ITU Patent Policy.
4. Attached hereto is Exhibit D, a true and accurate copy of Nat'l Research Council of the Nat'l Acads., Patent Challenges for Standard-Setting in the Global Economy (2013).

5. Attached hereto is Exhibit E, a true and accurate copy of the International Trade Commission's decision in In the Matter of Certain Elec. Devices, Including Wireless Commc'n Devices, Portable Music & Data Processing Devices, & Tablet Computers, Inv. No. 337-TA-794 at 65 (July 5, 2013).
6. Attached hereto is Exhibit F, a true and accurate copy of the U.S. Dep't of Justice & U.S. Patent and Trademark Office Policy Statement on Remedies for Standards-Essential Patents Subject to Voluntary F/RAND Commitments, January 8, 2013.

Executed on February 24, 2014.


Paul W. McAndrews